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FILED

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

MAY 1 7 2017

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,	
Plaintiff,	
v.	No. 4:17CR00223 RWS/PLC
COREY MIDDLEBROOK,	
Defendant.)

INDICTMENT

COUNT 1 - Mail Fraud

The Grand Jury charges that:

1. From in or before August 2016 until on or about September 30, 2016, in St. Louis County, within the Eastern District of Missouri,

COREY MIDDLEBROOK,

the Defendant herein, did knowingly devise and execute and intend to devise and execute a scheme and artifice to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, in that Defendant fraudulently applied for and obtained credit accounts using the means of identification of other persons.

- 2. It was part of the scheme and artifice that the Defendant obtained the names, dates of birth, and social security numbers of other individuals without their knowledge or consent.
- 3. It was part of the scheme and artifice that the Defendant fraudulently used other individuals' names, dates of birth, and social security numbers to apply online for credit cards.

- 4. It was part of the scheme and artifice that as a result of the fraudulent credit applications, the Defendant caused various financial institutions to send credit cards in other individuals' names to the Defendant's address in St. Louis County through the United States mail and commercial interstate carriers.
- 5. It was part of the scheme and artifice that the Defendant used the fraudulently obtained credit cards to purchase merchandise and services from various businesses.
- 6. It was part of the scheme and artifice that on or about August 4, 2016, the Defendant opened a fraudulent credit card account with Synchrony Bank, bearing account number xxxx-xxxx-xxxx-9014, using the name, date of birth, and social security number of an individual whose initials are "R.L.D."
- 7. It was part of the scheme and artifice that the Defendant used the fraudulent Synchrony Bank credit card to purchase merchandise at H H Gregg stores.
- 8. On or about September 4, 2016, within the Eastern District of Missouri and elsewhere,

COREY MIDDLEBROOK,

the Defendant herein, for the purpose of executing the aforementioned scheme and artifice to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, knowingly caused to be delivered by United States mail and by commercial interstate carrier from Synchrony Bank to the Defendant's address in St. Louis County, Missouri, a credit card bill for account number xxxx-xxxx-xxxx-9014.

In violation of Title 18, United States Code, Section 1341.

COUNT 2 – Wire Fraud

The Grand Jury further charges that:

- 1. The factual allegations contained in paragraphs 1 through 7 of Count 1 of this Indictment are restated as if fully set forth herein.
- 2. On or about August 4, 2016, within the Eastern District of Missouri and elsewhere,

COREY MIDDLEBROOK,

the Defendant herein, for the purpose of executing the aforementioned scheme and artifice to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, in that Defendant submitted a fraudulent online application for a credit card to Synchrony Bank using the name, date of birth, and social security number of R.L.D.

In violation of Title 18, United States Code, Section 1343.

COUNT 3 - Aggravated Identity Theft

The Grand Jury further charges that:

- 1. The factual allegations contained in paragraphs 1 through 7 of Count 1 of this Indictment are restated as if fully set forth herein.
 - 2. On or about August 4, 2016, within the Eastern District of Missouri,

COREY MIDDLEBROOK,

the Defendant herein, during and in relation to the felony offenses of Mail Fraud in violation of 18 U.S.C. § 1341 and Wire Fraud in violation of 18 U.S.C. § 1343, knowingly transferred,

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possessed, and used, without lawful authority, the date of birth and social security number of "R.L.D."

In violation of Title 18, United States Code, Section 1028A.

A TRUE BILL.

FOREPERSON

CARRIE COSTANTIN
Acting United States Attorney

REGINALD L. HARRIS, #48939MO Assistant United States Attorney